

Jyotin Hamid
DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, New York 10022
Telephone: (212) 909-6000
jhamid@debevoise.com
Attorneys for the BF Parties

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**WHITE LILLY, LLC and JONATHAN
BERNSTEIN,**

Plaintiffs,

– against –

**BALESTRIERE PLLC, BALESTRIERE
FARIELLO, JOHN BALESTRIERE, THE
LAW OFFICES OF ADINA G. STORCH,
PLLC, and ADINA STORCH,**

Defendants.

Case No.: 1:18-cv-12404(ALC)(SN)

**DECLARATION OF JYOTIN
HAMID IN SUPPORT OF THE
BF PARTIES' MOTION TO
COMPEL ARBITRATION**

I, Jyotin Hamid, an attorney duly admitted to practice law in the Southern District of New York, of legal age and under penalty of perjury, declare the following:

1. I am an attorney with the law firm Debevoise & Plimpton LLP, which represents Balestriere PLLC, Balestriere Fariello (“the Firm”) and John G. Balestriere (“Balestriere,” together with the Firm, “the BF Parties”) in the above-referenced action. I provide this Declaration in support of the BF Parties’ Motion to Compel Arbitration.

2. Attached to this declaration as Exhibit A is a true and correct copy of the engagement agreement between Bernstein, the Firm, the Law Offices of Adina G. Storch PLLC (the “Storch Firm”), and an entity belonging to Bernstein’s friend, Juan Diaz Rivera (“Diaz

Rivera”), called Desarrolladora Farallon S. de R.L. de C.V. (“Farallon,” collectively with Diaz Rivera, the “Diaz Rivera Parties”), dated November 20, 2014.

3. Attached to this declaration as Exhibit B is a true and correct copy of the engagement agreement between Bernstein, the Firm, the Storch Firm, Farallon, and Diaz Rivera individually, dated March 17, 2015.

4. Attached to this declaration as Exhibit C is a true and correct copy of the Notice of Claim in the Fee Collection Arbitration.

5. Attached to this declaration as Exhibit D is a true and correct copy of a transcript of the January 15, 2019, Preliminary Injunction Argument.

6. Attached to this declaration as Exhibit E is a true and correct copy of the January 18, 2019, letter from Bernstein to the American Arbitration Association.

7. Attached to this declaration as Exhibit F is a true and correct copy of the November 2, 2014, Capitalization Agreement between Bernstein and Diaz Rivera.

8. Attached to this declaration as Exhibit G is a true and correct copy of the February 24, 2016, engagement letter addendum.

Dated: New York, New York
February 5, 2019

By: /s/Jyotin Hamid
Jyotin Hamid
DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, New York 10022
Telephone: (212) 909-6000
jhamid@debevoise.com
Attorneys for the BF Parties